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Subject:
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Time-Critical Removal Action – Former Plainwell Impoundment
Monthly Report (April 2008)

INDUSTRIAL

Dear Mike:

Date:
May 15, 2008

Attached is the 14th monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Time-Critical Removal Action (TCRA). This progress report is submitted in accordance with Section 19A of the February 2007 Administrative Settlement Agreement and Order on Consent for Removal Action (Docket No. V-W-07-C-863).

Contact:
Steve Garbaciak

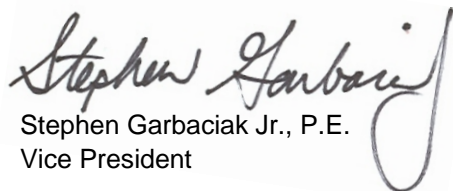
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If you have any questions, please do not hesitate to contact me.

Email:
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Sincerely,

ARCADIS


Stephen Garbaciak Jr., P.E.
Vice President

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Imagine the result

**MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE
TIME-CRITICAL REMOVAL ACTION – FORMER PLAINWELL IMPOUNDMENT**

REPORT #14, APRIL 2008

**PREPARED BY ARCADIS
MAY 15, 2008**

ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP

SUBMITTED TO

**MICHAEL RIBORDY, ON-SCENE COORDINATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site TCRA – Former Plainwell Impoundment**

REPORT #14, APRIL 2008

Significant Developments and Activities During the Period

- On April 1, the Kalamazoo River Study Group (KRSRG) submitted a copy of the 40th *Weekly Construction Report for the Plainwell TCRA* to the United States Environmental Protection Agency (USEPA) and the Michigan Department of Environmental Quality (MDEQ).
- On April 3 and 7, the KRSRG submitted comments on a draft Press Release titled *Kalamazoo River Between Plainwell and Otsego Closed for 2008* to the Michigan Department of Natural Resources (MDNR).
- On April 4, the KRSRG received a copy of the USEPA-approved *Quality Assurance Project Plan*, which was prepared by MDEQ.
- On April 7, the KRSRG submitted a copy of the 41st *Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.
- On April 7, the KRSRG submitted a memo detailing revisions to the restoration/planting plan to USEPA and MDEQ.
- On April 7, the MDEQ issued the Press Release titled *Kalamazoo River Between Plainwell and Otsego Closed for 2008*.
- On April 10, the KRSRG submitted the *Hazardous Waste Year End User Charge Report* to MDEQ.
- On April 11, the USEPA approved the revisions to the restoration plan as proposed by the KRSRG on April 7.
- On April 11, the KRSRG submitted proposed changes to the bank stabilization plan for eroded areas in Removal Areas 6B and 7B to USEPA and MDEQ.
- On April 11 and 22, the KRSRG submitted copies of analytical data from TCRA sampling activities to USEPA.
- On April 15, the KRSRG submitted the 13th *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site TCRA* for March 2008 to USEPA.
- On April 16, the KRSRG submitted a draft poster detailing the 2008 river closure to MDNR.
- On April 16, the KRSRG, USEPA, MDEQ, MDNR, and United States Fish and Wildlife Service (USFWS) attended the Monthly Stakeholder's Meeting in Plainwell.
- On April 17, the KRSRG submitted a copy of the 42nd *Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.

**Monthly Report for the Allied Paper, Inc./Portage Creek/
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- On April 21, the KRSG submitted a copy of the 43rd *Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.
- On April 22 and 30, the KRSG received copies of analytical data for the split samples collected by USEPA.
- On April 23, the KRSG submitted *Addendum 3, Change to Thermal – Protective Clothing Requirement, to the Multi-Area Health and Safety Plan (Rev. 1) for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site* to USEPA and MDEQ.
- On April 24, the KRSG submitted the spring planting schedule for restoration activities to be conducted in Removal Areas 1 through 8 to USEPA, MDEQ, MDNR, and USFWS.
- On April 24 and 28, the MDNR informed the KRSG that they would be onsite on May 8 to observe the restoration activities to be conducted in Removal Areas 1 through 8.
- On April 30, the KRSG submitted a copy of the 44th *Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.

Data Collected and Field Activities Conducted During the Period

- During the week of April 1, the KRSG began installation of a diversion wall and resuspension controls in Removal Area 9B, and completed excavation of 200 linear feet of material located at the downstream end of Removal Area 13B. Two floodplain soil confirmation samples (TS20000 and TS20001) were collected in Removal Area 13B and submitted for polychlorinated biphenyls (PCB) analysis. The USEPA collected a split sample of TS20000 (APS-040408-14-SD/TS20000). Two surface water samples (TS30003 and TS30004) were collected from locations 150 feet downstream and 100 feet upstream, respectively, of Removal Area 13B for PCB analysis. Due to the proximity of the spillway, the downstream surface water sample could not safely be collected from its usual distance of 300 feet downstream of the removal area. A rinse blank (TS30005) and duplicate (TS30006) were also collected. Wastewater samples W_SA3S_Influ_0044, W_SA3S_Influ_0045 (influent port), W_SA3S_MidA_0040, W_SA3S_MidA_0041 (mid-point port, right side), W_SA3S_MidB_0044, W_SA3S_MidB_0045 (mid-point port, left side), W_SA3S_EffluA_0040, W_SA3S_EffluA_0041 (effluent port, right side), W_SA3S_EffluB_0044 and W_SA3S_EffluB_0045 (effluent port, left side) were collected from the 25 gallon per minute (GPM) water treatment system located at Staging Area 3S prior to discharge. Table A summarizes the samples collected. Trees and stumps from winter clearing and grubbing activities were loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal.

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- During the week of April 7, the KRSG began excavation of soil/sediment in Removal Area 9B, installed erosion control measures in Removal Area 9A to protect against diverted flow from Removal Area 9B, installed resuspension controls in Removal Area 10B, and installed river run rock in Removal Area 13B. Two surface water samples (TS30007 and TS30008) were collected from locations 300 feet downstream and 200 feet upstream, respectively, of Removal Area 9B for PCB analysis. A rinse blank (TS30009) was also collected. Wastewater samples W_SA3S_Influ_0046, W_SA3S_Influ_0047, W_SA3S_Influ_0048 (influent port), W_SA3S_MidA_0042, W_SA3S_MidA_0043, W_SA3S_MidA_0044 (mid-point port, right side), W_SA3S_MidB_0046, W_SA3S_MidB_0047, W_SA3S_MidB_0048 (mid-point port, left side), W_SA3S_EffluA_0042, W_SA3S_EffluA_0043, W_SA3S_EffluA_0044 (effluent port, right side), W_SA3S_EffluB_0046, W_SA3S_EffluB_0047 and W_SA3S_EffluB_0048 (effluent port, left side) were collected from the 25 GPM water treatment system located at Staging Area 3S prior to discharge. Trees and stumps from winter clearing and grubbing activities and processed soil and sediment from excavation activities were loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal.
- During the week of April 14, the KRSG continued excavation activities in Removal Area 9B, installed resuspension controls in Removal Area 10B, and grouted the water control structure scour protection. Two surface water samples (TS30010 and TS30011) were collected from locations 300 feet downstream and 200 feet upstream, respectively, of Removal Area 9B for PCB analysis. A rinse blank (TS30012) was also collected. Wastewater samples W_SA3S_Influ_0049, W_SA3S_Influ_0050 (influent port), W_SA3S_MidA_0045, W_SA3S_MidA_0046 (mid-point port, right side), W_SA3S_MidB_0049, W_SA3S_MidB_0050 (mid-point port, left side), W_SA3S_EffluA_0045, W_SA3S_EffluA_0046 (effluent port, right side), W_SA3S_EffluB_0049 and W_SA3S_EffluB_0050 (effluent port, left side) were collected from the 25 GPM water treatment system located at Staging Area 3S prior to discharge. A duplicate of sample W_SA3S_EffluB_0049 (W_SA3S_Dup_0011) was also collected. One PCB wipe sample (VT-61) was collected from the vacuum truck used to remove the carbon from the water treatment system to confirm that the truck was properly decontaminated prior to demobilization. Table A summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal.
- During the week of April 21, the KRSG completed excavation in Removal Area 9B, began excavation in Removal Area 10B, installed resuspension controls in Removal Areas 9A and 10B, began preparing for the removal of the Phase 1 Cofferdam, installed topsoil and erosion control blankets at Removal Area 9B and in the Phase 1 Cofferdam Area, and installed scour monitoring poles in Mid-Channel Areas A and B. Fourteen floodplain and bank soil confirmation samples (TS20002 through TS20016) and one duplicate sample (TS20011) were collected from Removal Area 9B and submitted for PCB analysis. Two surface water samples (TS30013 and TS30014) were collected from locations 300 feet downstream and 200 feet upstream, respectively, of Removal Area 10B for PCB analysis. A rinse blank (TS30015) was also collected. Wastewater samples W_SA3S_Influ_0051, W_SA3S_Influ_0052 (influent port), W_SA3S_MidA_0047 (mid-point port, right side),

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W_SA3S_MidB_0051 (mid-point port, left side), W_SA3S_EffluA_0047 (effluent port, right side) and W_SA3S_EffluB_0051 (effluent port, left side) were collected from the 25 GPM water treatment system located at Staging Area 3S prior to discharge. One PCB wipe sample (VT-66) was collected from the vacuum truck used to remove the carbon from the water treatment system to confirm that the truck was properly decontaminated prior to demobilization. Table A summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal.

- During the week of April 28, the KRSG continued excavation in Removal Area 10B and Upland Area 10B1, began excavation in Removal Area 9A, and began removal of the Phase 1 Cofferdam. Seven bank soil confirmation samples (TS20017 through TS20023) were collected from Removal Areas 9B and 10B. The USEPA collected a split sample of TS20017 (APS-042808-15-SD/TS20017). Table A summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal.
- As of April 30, approximately 47,000 cubic yards of material had been excavated from Removal Areas 1, 2A and 2B, 3A and 3B, 4A and 4B, 5, 6A and 6B, 7, 8, 9A, 9B, 10B, 13B, the Phase 1 Cofferdam Area, Upland Areas 3A1, 3A2, 4A1, 6B1, and 10B1, and Islands 1, 2 and 3.

Laboratory Data Received During the Period

- During the week of April 1, the KRSG received analytical data for wastewater samples W_SA3S_Influ_0044, W_SA3S_Influ_0045, W_SA3S_MidA_0040, W_SA3S_MidA_0041, W_SA3S_MidB_0044, W_SA3S_MidB_0045, W_SA3S_EffluA_0040, W_SA3S_EffluA_0041, W_SA3S_EffluB_0044 and W_SA3S_EffluB_0045.
- During the week of April 7, the KRSG received analytical data for soil confirmation samples TS20000 and TS20001.
- During the week of April 14, the KRSG received analytical data for wastewater samples W_SA3S_Influ_0046, W_SA3S_Influ_0047, W_SA3S_Influ_0048, W_SA3S_Influ_0049, W_SA3S_Influ_0050, W_SA3S_MidA_0042, W_SA3S_MidA_0043, W_SA3S_MidA_0044, W_SA3S_MidA_0045, W_SA3S_MidA_0046, W_SA3S_MidB_0046, W_SA3S_MidB_0047, W_SA3S_MidB_0048, W_SA3S_MidB_0049, W_SA3S_MidB_0050, W_SA3S_EffluA_0042, W_SA3S_EffluA_0043, W_SA3S_EffluA_0044, W_SA3S_EffluA_0045, W_SA3S_EffluA_0046, W_SA3S_EffluB_0046, W_SA3S_EffluB_0047, W_SA3S_EffluB_0048, W_SA3S_EffluB_0049, W_SA3S_EffluB_0050 and W_SA3S_Dup_0011.

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- During the week of April 21, the KRSG received analytical data for soil confirmation samples TS20002 through TS20016, USEPA split sample APS-040408-14-SD/TS20000, surface water samples TS30000 through TS30006 (samples TS30000 through TS30002 were collected in March), PCB wipe samples VT-61 and VT-66 and wastewater samples W_SA3S_Influ_0051, W_SA3S_MidA_0047 and W_SA3S_EffluA_0047.
- During the week of April 28, the KRSG received analytical data for soil confirmation samples TS20017 through TS20023, USEPA split sample APS-042808-15-SD/TS20017, surface water samples TS30007 through TS30009 and wastewater samples W_SA3S_Influ_0052, W_SA3S_MidB_0051 and W_SA3S_EffluB_0051.
- The KRSG is awaiting analytical results for surface water samples TS30010 through TS30015.

Issues Encountered and Actions Taken

- During the week of April 1, the USEPA verbally directed KRSG to revise the bank sampling protocol to include the areas located between the top of bank (landward side) and the toe of the slope on the river side created at the conclusion of excavation activities. Previously, the riverside bank sampling area was defined as the area located between the top of bank and the dam-in median water elevation. The KRSG adjusted the bank sampling protocol accordingly and awaits written confirmation of the verbal direction.
- Low concentrations of PCBs were detected in surface water samples TS30004 and TS30006 collected from 200 feet upstream and 150 downstream, respectively, of Removal Area 13B on April 3. TS30006 was a duplicate sample of downstream sample TS30003. PCBs were not detected in surface water sample TS30003. Surface water samples are usually collected from 300 feet downstream of a removal area; however, due to the proximity of the Plainwell Dam spillway, surface water samples could not safely be collected from that distance. According to the Former Plainwell Impoundment TCRA Design Report, there is no response action for surface water samples. Turbidity readings are used to determine the effectiveness of the turbidity curtain around a removal area. No elevated turbidity readings were recorded on April 3 or throughout excavation activities in Removal Area 13B.
- During the week of April 7, PCB was detected in several mid-point samples from both the right and the left sides of the 25 GPM water treatment system located at Staging Area 3S. The mid-point samples are collected between the lead and lag carbon vessels. According to the Substantive Requirements Document (SRD) Number MIU990025, if PCBs are detected in the mid-point samples, the carbon should immediately be replaced. As such, the KRSG replaced the carbon in the lead tank on the left side of the treatment system and in the lead and lag tanks on the right side of the system. PCBs were not detected in any of the effluent samples.

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- During the week of April 7, the KRSG submitted a proposal to revise the stabilization method for the eroded bank in Removal Area 6B/7B with river run rock. Also during the week of April 7, the MDEQ collected thirteen soil samples from Removal Area 6B/7B and submitted them for PCB analysis. The samples were collected from a lens of gray material that was exposed due to erosion in the area. During the week of April 29, USEPA informed the KRSG that minimal rock should be used in the area, and that the gray material should be excavated and the bank rebuilt. The KRSG is generating a proposal to address the USEPA comments.
- On April 8, approximately 1 gallon of hydraulic fluid was released from equipment operating at Staging Area 4N. A spill kit was immediately used to contain the release, and the impacted soil was excavated and staged at Staging Area 5S to await disposal.
- During the week of April 14, the air monitoring action limit was reached while filling the hopper at Staging Area 3S with Portland cement. Water was used to suppress the dust generated during these activities, and personnel donned dust masks to lower exposure to the dust. The KRSG is looking into a long term method to reduce worker exposure to dust during these events of filling the silos with solidification amendments.
- Two weekly surface water samples (TS30013 and TS30014) and 1 rinse blank sample (TS30015) were collected on April 24. During extraction, the laboratory damaged all three samples. A backup sample was collected for TS30013 and TS30014; however no backup was collected for TS30015. As such, PCB data will be available for the upstream and downstream samples, but not for the rinse blank.

Developments Anticipated During the Next Reporting Period

- During the week of May 1, the KRSG is scheduled to begin tree and shrub planting in Removal Areas 1 through 8, continue excavation of Removal Areas 9A, 10B, and Upland Area 10B1, continue removal of the Phase 1 Cofferdam, and continue loading and transporting solidified material to the appropriate landfill.
- During the week of May 5, the KRSG is scheduled to continue tree and shrub planting in Removal Areas 1 through 8, complete excavation of Removal Area 9A, continue excavation of Removal Area 10B and Upland Area 10B1, continue removal of the Phase 1 Cofferdam, and continue loading and transporting solidified material to the appropriate landfill.
- During the week of May 12, the KRSG is scheduled to continue tree and shrub planting in Removal Areas 1 through 8, begin grading and removal of resuspension controls in Removal Area 9A, complete excavation of Removal Area 10B and Upland Area 10B1, install resuspension controls in Removal Area 10A, continue removal of the Phase 1 Cofferdam, and continue loading and transporting solidified material to the appropriate landfill.

**Monthly Report for the Allied Paper, Inc./Portage Creek/
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- During the week of May 19, the KRSG is scheduled to complete tree and shrub planting in Removal Areas 1 through 8, continue grading and removal of resuspension controls in Removal Area 9A, 10B, and Upland Area 10B1, begin excavation in Removal Area 10A, complete removal of the Phase 1 Cofferdam, host the monthly Stakeholder's Meeting, and continue to loading and transporting solidified material to the appropriate landfill.
- During the week of May 26, the KRSG is scheduled to continue grading and removal of resuspension controls in Removal Area 10A and Upland Area 10B1, continue excavation of Removal Area 10A and continue to loading and transporting solidified material to the appropriate landfill.
- The KRSG will continue to submit the *Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ in May.
- The KRSG will continue to submit copies of analytical data from TCRA sampling activities to USEPA in May.
- Throughout May, the KRSG will, as necessary, continue to submit Subcontractor Qualification Notifications to USEPA, as required by Paragraph 11 of the TCRA Administrative Order on Consent (AOC).

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment TCRA
Monthly Report #14, April 2008

Table A — Summary of Samples Collected and Data Received in April 2008

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action					
Soil Confirmation Samples														
TS20000 ¹	04/04/08	04/07/08	081244	KAR Labs	RA 13B, Grid 10	PCBs	< 0.33 mg/kg	5 mg/kg	None					
APS-040408-14-SD/TS20000		04/22/08	0804082	TriMatrix Laboratories			0.072 J mg/kg	5 mg/kg	None					
TS20001		04/07/08	081244	KAR Labs			0.49 mg/kg	5 mg/kg	None					
TS20002	04/22/08	04/24/08	081509	KAR Labs	RA 9B, Grid 3 (BS)	PCBs	< 0.33 mg/kg	5 mg/kg	None					
TS20003	04/21/08	04/23/08	081492	KAR Labs	RA 9B, Grid 3	PCBs	< 0.33 mg/kg	5 mg/kg	None					
TS20004					RA 9B, Grid 2		0.33 mg/kg	5 mg/kg	None					
TS20005					RA 9B, Grid 4		< 0.33 mg/kg	5 mg/kg	None					
TS20006					RA 9B, Grid 5		0.67 mg/kg	5 mg/kg	None					
TS20007					RA 9B, Grid 6		< 0.33 mg/kg	5 mg/kg	None					
TS20008					RA 9B, Grid 2 (BS)		< 0.33 mg/kg	5 mg/kg	None					
[TS20011]							[< 0.33 mg/kg]	[5 mg/kg]	[None]					
TS20009							RA 9B, Grid 1 (BS)	< 0.33 mg/kg	5 mg/kg	None				
TS20010					04/22/08		04/24/08	081509	KAR Labs	RA 9B, Grid 1	PCBs	< 0.33 mg/kg	5 mg/kg	None
TS20012										RA 9B, Grid 3 (BS)		< 0.33 mg/kg	5 mg/kg	None
TS20013	RA 9B, Grid 4 (BS)	< 0.33 mg/kg	5 mg/kg	None										
TS20014	RA 9B, Grid 5 (BS)	< 0.33 mg/kg	5 mg/kg	None										
TS20015	RA 9B, Grid 6 (BS)	< 0.33 mg/kg	5 mg/kg	None										
TS20016	RA 9B, Grid 7	0.57 mg/kg	5 mg/kg	None										
TS20017 ¹	04/28/08	04/30/08	081608	KAR Labs	RA 10B, Grid 1 (BS)	PCBs	<0.33 mg/kg	5 mg/kg	None					
APS-042808-15-SD/TS20017			0804555	TriMatrix Laboratories			0.053 J mg/kg	5 mg/kg	None					
TS20018			081608	KAR Labs			RA 10B, Grid 2 (BS)	0.56 mg/kg	5 mg/kg	None				
TS20019							RA 10B, Grid 3 (BS)	<0.33 mg/kg	5 mg/kg	None				
TS20020							RA 10B, Grid 4 (BS)	<0.33 mg/kg	5 mg/kg	None				
TS20021	04/29/08	04/30/08	081620	KAR Labs	RA 9B, Grid 8 (BS)	PCBs	<0.33 mg/kg	5 mg/kg	None					
TS20022					RA 10B, Grid 6 (BS)		<0.33 mg/kg	5 mg/kg	None					
TS20023					RA 10B, Grid 5 (BS)		0.36 mg/kg	5 mg/kg	None					

See Notes on Page 5.

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment TCRA
Monthly Report #14, April 2008

Table A — Summary of Samples Collected and Data Received in April 2008

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action	
Surface Water Samples										
TS30000	03/27/08	04/21/08	TCRA31	TAL	150' downstream of RA 13B	PCBs	<0.061 mg/L	-	None	
TS30001					100' upstream of RA 13B	PCBs	<0.055 mg/L	-	None	
TS30002					Rinse Blank	PCBs	<0.068 mg/L	-	None	
TS30003 [TS30006]	04/03/08	04/21/08	TCRA31	TAL	150' downstream of RA 13B	PCBs [PCBs]	<0.055 mg/L [0.027 J mg/L]	-	None [None]	
TS30004					100' upstream of RA 13B	PCBs	<0.053 mg/L	-	None	
TS30005					Rinse Blank	PCBs	0.030 J mg/L	-	None	
TS30007	04/10/08	04/29/08	TCRA34	TAL	300' downstream of RA 9B	PCBs	< 0.057 mg/L	-	None	
TS30008					200' upstream of RA 9B	PCBs	< 0.058 mg/L	-	None	
TS30009					Rinse Blank	PCBs	< 0.057 mg/L	-	None	
TS30010	04/17/08	NR	NR	TAL	300' downstream of RA 9B	PCBs	-	-	-	
TS30011					200' upstream of RA 9B	PCBs	-	-	-	-
TS30012					Rinse Blank	PCBs	-	-	-	-
TS30013	04/24/08	NR	NR	TAL	300' downstream of RA 10B	PCBs	-	-	-	
TS30014					200' upstream of RA 10B	PCBs	-	-	-	-
TS30015					Rinse Blank	PCBs	-	-	-	-
Wastewater Samples										
W_SA3S_Influ_0044	04/01/08	04/02/08	081185	KAR Labs	Staging Area 3S, Discharge 44, influent sample	PCBs	0.2 µg/L	-	-	
W_SA3S_MidA_0040					Staging Area 3S, Discharge 44, midpoint sample, right side	PCBs	< 0.1 µg/L	-	-	
W_SA3S_EffluA_0040					Staging Area 3S, Discharge 44, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = 16 mg/L, Action Limit = 45 mg/L	
W_SA3S_MidB_0044					Staging Area 3S, Discharge 44, midpoint sample, left side	PCBs	< 0.1 µg/L	-	-	
W_SA3S_EffluB_0044					Staging Area 3S, Discharge 44, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L	

See Notes on Page 5.

**Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment TCRA
Monthly Report #14, April 2008**

Table A — Summary of Samples Collected and Data Received in April 2008

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
Wastewater Samples (continued)									
W_SA3S_Influ_0045	04/03/08	04/04/08	081230	KAR Labs	Staging Area 3S, Discharge 45, influent sample	PCBs	0.2 µg/L	-	-
W_SA3S_MidA_0041					Staging Area 3S, Discharge 45, midpoint sample, right side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluA_0041					Staging Area 3S, Discharge 45, effluent sample, right side	PCBs, TSS, P	< 0.1 µg/L	Monthly Average of 2.6 x 10 ⁻⁵ µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L; P=0.03 mg/L, No Action Limit
W_SA3S_MidB_0045					Staging Area 3S, Discharge 45, midpoint sample, left side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluB_0045					Staging Area 3S, Discharge 45, effluent sample, left side	PCBs, TSS, P	< 0.1 µg/L	Monthly Average of 2.6 x 10 ⁻⁵ µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L; P=0.05 mg/L, No Action Limit
W_SA3S_Influ_0046	04/10/08	04/14/08	081342	KAR Labs	Staging Area 3S, Discharge 46, influent sample	PCBs	0.1 µg/L	-	-
W_SA3S_MidA_0042					Staging Area 3S, Discharge 46, midpoint sample, right side	PCBs	0.1 µg/L	-	Change Carbon
W_SA3S_EffluA_0042					Staging Area 3S, Discharge 46, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10 ⁻⁵ µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_MidB_0046					Staging Area 3S, Discharge 46, midpoint sample, left side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluB_0046					Staging Area 3S, Discharge 46, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10 ⁻⁵ µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_Influ_0047	04/11/08	04/14/08	081371	KAR Labs	Staging Area 3S, Discharge 47, influent sample	PCBs	0.6 µg/L	-	-
W_SA3S_MidA_0043					Staging Area 3S, Discharge 47, midpoint sample, right side	PCBs	0.1 µg/L	-	Change Carbon
W_SA3S_EffluA_0043					Staging Area 3S, Discharge 47, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10 ⁻⁵ µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_MidB_0047					Staging Area 3S, Discharge 47, midpoint sample, left side	PCBs	0.1 µg/L	-	Change Carbon
W_SA3S_EffluB_0047					Staging Area 3S, Discharge 47, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10 ⁻⁵ µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L

See Notes on Page 5.

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment TCRA
Monthly Report #14, April 2008

Table A — Summary of Samples Collected and Data Received in April 2008

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
Wastewater Samples (continued)									
W_SA3S_Influ_0048	04/12/08	04/15/08	081370	KAR Labs	Staging Area 3S, Discharge 48, influent sample	PCBs	0.4 µg/L	-	-
W_SA3S_MidA_0044					Staging Area 3S, Discharge 48, midpoint sample, right side	PCBs	0.1 µg/L	-	Change Carbon
W_SA3S_EffluA_0044					Staging Area 3S, Discharge 48, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_MidB_0048					Staging Area 3S, Discharge 48, midpoint sample, left side	PCBs	0.1 µg/L	-	Change Carbon
W_SA3S_EffluB_0048					Staging Area 3S, Discharge 48, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_Influ_0049	04/15/08	04/16/08	081399	KAR Labs	Staging Area 3S, Discharge 49, influent sample	PCBs	< 0.1 µg/L	-	-
W_SA3S_MidA_0045					Staging Area 3S, Discharge 49, midpoint sample, right side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluA_0045					Staging Area 3S, Discharge 49, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_MidB_0049					Staging Area 3S, Discharge 49, midpoint sample, left side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluB_0049					Staging Area 3S, Discharge 49, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
[W_SA3S_Dup_0011]						[PCBs, TSS]	[< 0.1 µg/L]	[Monthly Average of 2.6 x 10-5 µg/L]	[None: TSS = <4 mg/L, Action Limit = 45 mg/L]
W_SA3S_Influ_0050	04/16/08	04/17/08	081414	KAR Labs	Staging Area 3S, Discharge 50, influent sample	PCBs	< 0.1 µg/L	-	-
W_SA3S_MidA_0046					Staging Area 3S, Discharge 50, midpoint sample, right side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluA_0046					Staging Area 3S, Discharge 50, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_MidB_0050					Staging Area 3S, Discharge 50, midpoint sample, left side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluB_0050					Staging Area 3S, Discharge 50, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L

See Notes on Page 5.

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Table A — Summary of Samples Collected and Data Received in April 2008

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
Wastewater Samples (continued)									
W_SA3S_Influ_0051	04/22/08	04/22/08	081508	KAR Labs	Staging Area 3S, Discharge 51, influent sample	PCBs	0.7 µg/L	-	-
W_SA3S_MidA_0047					Staging Area 3S, Discharge 51, midpoint sample, right side	PCBs	0.1 µg/L	-	Change Carbon
W_SA3S_EffluA_0047					Staging Area 3S, Discharge 51, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_Influ_0052	04/26/08	04/29/08	081606	KAR Labs	Staging Area 3S, Discharge 52, influent sample	PCBs	< 0.1 µg/L	-	-
W_SA3S_MidB_0051					Staging Area 3S, Discharge 52, midpoint sample, left side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluB_0051					Staging Area 3S, Discharge 52, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
PCB Wipe Samples									
VT-61	04/18/08	04/21/08	081476	KAR Labs	Interior of the vacuum truck used to remove the carbon from the	PCBs	< 0.25 µg/100 cm²	10 µg/100 cm² ²	None
VT-66	04/24/08	04/25/08	081551	KAR Labs	Interior of the vacuum truck used to remove the carbon from the	PCBs	0.4 µg/100 cm²	10 µg/100 cm² ²	None

Notes:

- 1 - Split sample collected by USEPA.
- 2 - The decontamination standard for non-porous materials previously in contact with PCB-containing liquid according to Federal Regulations (Title 40, Chapter 1, Subchapter R, Part 761.79.3)
- J - The compound was positively identified; however, the associated numerical value is an estimated concentration only
- * USEPA split samples are shown in bold and italicized font.
- * Duplicate samples are shown in brackets.
- * Analytical results have not been validated.

Notes:

BS - bank sample
NR - not received
P - Phosphorus
PCBs - Polychlorinated Biphenyls
RA - Removal Area
TAL - TestAmerica Laboratories

TSS - Total Suspended Solids
mg/kg - milligrams per kilogram
mg/L - milligrams per liter
µg/L - micrograms per liter
µg/100 cm² - microgram per square centimeter